

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

TYLER TECHNOLOGIES, INC.,

Plaintiff,

v.

VBCONVERSIONS LLC,

Defendant.

Civil Action No. 4:14-cv-00150

**DECLARATION OF ELIZABETH RENSENBRINK IN SUPPORT OF
PLAINTIFF TYLER TECHNOLOGIES, INC.'S RESPONSE TO DEFENDANT'S
MOTION TO DISMISS OR TRANSFER**

I, Elizabeth Rensenbrink, hereby declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Human Resources Director at Tyler Technologies, Inc. ("Tyler"). I am over eighteen (18) years of age, and I am otherwise fully competent to make this Declaration. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge, following a reasonable investigation, or corporate records maintained by Tyler in the ordinary course of business.

2. My office is located at 1 Tyler Drive in Yarmouth, Maine.

3. Tyler's corporate finance, accounting, tax, and marketing departments, as well as its General Counsel's office, are all headquartered at 5101 Tennyson Parkway, Plano, Texas 75024.

4. Tyler does not maintain any offices in California.

5. Tyler provides an Employee Handbook to all of its employees. All employees are required to provide written acknowledgement that they received this Handbook and are

responsible for reading it in its entirety.

6. The Employee Handbook includes an End-User Technology Policy. This policy instructs all Tyler employees to respect all third-party copyrights, and informs all Tyler employees that using Tyler's hardware or networks to gain unauthorized access to any system or data may result in immediate dismissal.

7. The Employee Handbook also informs all Tyler employees that they are not permitted to add software to their computers without first checking with Tyler's Information Technology staff, and they are advised that Tyler's policy is to adhere strictly to the letter and spirit of copyright laws and regulations.

8. Tyler has previously employed a man named Syed Abu Fahad and another man named Syed Muhammad Fahad.

9. Syed Abu Fahad became a Tyler employee in January 2006.

10. Syed Abu Fahad provided written acknowledgement that he received Tyler's Employee Handbook, and was responsible for reading it.

11. As of November 2006, Syed Abu Fahad was a Vice President of Product Development for the Tyler Education Management System ("TEMS") product.

12. As of January 2010, Syed Abu Fahad was a Program Manager for Eden, an entirely different product line that is not related to TEMS.

13. In October 2011, Syed Abu Fahad was an Offshore Program Manager for Tyler, focusing on Dynamics, an entirely different product line that is not related to TEMS.

14. In May 2014, Syed Abu Fahad was a part of a reduction in force that aligned with Tyler's termination of its offshore resources.


15. Syed Muhammad Fahad was hired as a TEMS developer on June 4, 2007. He occupied that same position until July 9, 2012, when he transferred to a different product line (SIS/Versatrans) that is not related to TEMS.

16. Syed Muhammad Fahad provided written acknowledgement that he received Tyler's Employee Handbook, and was responsible for reading it.

17. Syed Muhammad Fahad resigned on October 19, 2012. His stated reason for leaving Tyler was that he found a job with a higher salary.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on June 6, 2014.

Dated: June 6, 2014



Elizabeth Rensenbrink
Human Resources Director
Tyler Technologies, Inc.